

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 18, 2010

Name of company covered by this certification: The Conference Group, LLC

Form 499 Filer ID: 827275

Name of signatory: Gary R. Greenhawk

Title of signatory: Principle Partner

I, Gary Greenhawk, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. As we are an audio conferencing company, we maintain limited customer information that constitutes CPNI, and we have procedures in place to protect such information.

The company did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in 2009. The company does not have any information with respect to the processes pretexters are using to attempt to access CPNI, outside of the information that is publicly available in this docket. The company has taken steps to prevent CPNI, which are highlighted in the attached document.

The company did not receive any customer complaints in 2009 concerning the unauthorized release of CPNI.

Signed



ATTACHMENT A

The Conference Group – Summary of CPNI Procedures

The Conference Group, LLC (“TCG”) is committed to protecting the privacy of its customers. TCG provides conferencing services to requesting customers. TCG has established policies and procedures that are designed to ensure that it is in compliance with the Federal Communications Commission’s (“FCC”) rules regarding the use, disclosure, and access to CPNI. TCG provides this summary of those procedures in accordance with section 64.2009(e) of the FCC’s rules.

Permissible Uses of CPNI: TCG may use CPNI for the following purposes:

- to initiate, provide, render, and bill and collect for the conferencing service;
- to provide the services necessary to, or used in, the provision of the services that TCG provides to its customers;
- to protect TCG’s rights and property, or to protect our customers and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, our services;
- to provide administrative services to the customer for the duration of the call, if the customer initiated the call and approves of the use of such information; and
- as required by law.

Use of CPNI for Marketing Purposes: Currently, TCG does not use CPNI for marketing purposes. If it later determines to use CPNI for marketing purposes, then it will provide the appropriate customer notification, and it will maintain a record of such notification and of any marketing campaigns using CPNI, in accordance with the FCC’s rules.

CPNI Safeguards: TCG has implemented safeguards to protect its customers’ CPNI. Among other safeguards, TCG has implemented procedures to verify a customer’s identity on all in-bound customer calls. TCG does not release call detail information during an in-bound call. Instead, TCG will send call detail information (if requested) to the address of record.

TCG also has established procedures pursuant to which customers may make account changes. TCG also has procedures in place to notify customers when certain changes are made to their account, in accordance with the FCC’s rules.

TCG has implemented network security measures, including, but not limited to, the use of encryption.

Employee Training: TCG trains its personnel regarding when they are and are not permitted to use, disclose, and/or permit access to CPNI. TCG has an express disciplinary process in place for the misuse of CPNI, which includes the potential for termination.

Data Breaches: TCG will notify law enforcement within seven days of the reasonable discovery of a data breach involving CPNI. TCG also will notify affected customers as permitted to do so by law. TCG will maintain a record of such notifications in accordance with applicable law.

TCG also is mindful of attempts by pretexters to gain access to CPNI, and will report on any such attempts/methods that pretexters are using when it files its annual CPNI certification.

Customer Complaints: TCG tracks customer complaints it receives regarding CPNI. TCG will report on those complaints in its annual CPNI certification.

CPNI Certification: TCG has appointed an officer who is responsible for overseeing its compliance with the FCC’s CPNI rules. The officer will file an annual CPNI certification with the FCC.